

EXHIBIT 1



Michael Harris <michael.j.harris56@gmail.com>

Fwd: Re: Service of Discovery | Project Veritas v. O'Keefe, et al. | Case No. 7:23-cv-04533

1 message

Nick Whitney <nwhitney@smartbizlaw.com>

Wed, Jun 18, 2025 at 12:33 PM

To: Michael Harris <michael.j.harris56@gmail.com>

Cc: Jeff Childers <jchilders@smartbizlaw.com>, Charlie Hardage <hardagelaw@gmail.com>, Angela Masciulli <angela.masciulli@smartbizlaw.com>, Ellen Lord <ellen.lord@smartbizlaw.com>

Michael,

Please see below. As part of your client's document production responsive to our discovery requests, Jay Wolman promised to send a flash drive containing Mr. O'Keefe's Telegram messages on December 5th, and then shortly thereafter filed a motion to withdraw. Upon checking, we never received the promised flash drive. Please confer with Mr. Wolman and/or your client and provide the flash drive with the "Telegram materials", as well as tracking information and/or delivery confirmation of the promised flash drive.

Nick Whitney

nwhitney@smartbizlaw.com

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----- Forwarded message -----

From: Jay M. Wolman <jmw@randazza.com>

Date: Dec 5, 2024 at 2:37 PM -0500

To: Cassidy Curran <csc@randazza.com>

Cc: Jeff Childers <jchilders@smartbizlaw.com>, Nick Whitney <nwhitney@smartbizlaw.com>, notice@smartbizlaw.com, Angela Masciulli <angela.masciulli@smartbizlaw.com>, Marc J. Randazza <staff@randazza.com>

Subject: Re: Service of Discovery | Project Veritas v. O'Keefe, et al. | Case No. 7:23-cv-04533

Counsel,

I should note I tried uploading the O'Keefe Telegram materials, but I could not. Those are being sent via flash drive.

Sincerely,
Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel*

Randazza Legal Group, PLLC

100 Pearl Street, 14th Floor | Hartford, CT 06103

30 Western Avenue., Gloucester, MA 01930

353 Ocean Ave Ste. 4E, Brooklyn, NY 11226

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* Licensed to practice law in Connecticut, Massachusetts, New York and the District of Columbia.

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On Thu, Dec 5, 2024 at 2:29 PM Cassidy Curran <csc@randazza.com> wrote:

Counsel,

Attached, for service, please find Plaintiffs' Supplemental Responses to First Requests for Production of documents, along with Plaintiffs' privilege log. Document production can be found at the following link: <https://www.dropbox.com/scl/fo/it3s983eso1q2qwh32hif/AEW9SyRSay2F0d-fYAzAPHk?rlkey=ktjmjmsxee7y5l45i2u5xzt&st=7hwgy28o&dl=0>

Sincerely,

Cassidy Curran* | Randazza Legal Group

30 Western Avenue, Harbor Room | Gloucester, MA 01930

Tel: 702-420-2001 | Email: csc@randazza.com

Firm Offices - Las Vegas | Miami | New England

* Paralegal – not licensed to practice law.

On Mon, Dec 2, 2024 at 5:58 PM Cassidy Curran <csc@randazza.com> wrote:

Counsel,

Attached, please find the attached correspondence from Attorney Wolman concerning the confidential designations of the productions of George Skakel and Daniel Strack, along with privilege logs thereto. The bates-stamped documents can be found at the following links:

George Skakel: https://www.dropbox.com/scl/fo/hia9ncbxth8lti27mgwoh/ACyCJo_HppPsFavQwTik-Nk?rlkey=bdtiueeaawn2wdvgsey086x3&st=86ddhh1k&dl=0

Daniel Strak: <https://www.dropbox.com/scl/fo/wnoye3e53kv3jmtdamcb4/AJq8qcOP2aRce5FmJO5splI?rlkey=7hnk68mt8iip53aqghaoe37i5&st=55bowlyl&dl=0>

Sincerely,

Cassidy Curran* | Randazza Legal Group

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